

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MAY 2 3 2018

#### CERTIFIED MAIL #7014 2870 0001 9577 3205 RETURN RECEIPT REQUESTED

Ms. Kim Mayberry Environmental Coordinator Michigan Spring & Stamping of Muskegon LLC 2700 Wickham Drive Muskegon, Michigan 49441

Re:

Notice of Violation

Compliance Evaluation Inspection EPA RCRA ID No. MID006018485

Dear Ms. Mayberry:

On August 8, 2017, a representative of the U.S. Environmental Protection Agency inspected the Michigan Spring & Stamping of Muskegon LLC facility located in Muskegon, Michigan (MSSM). As a large quantity generator of hazardous waste, MSSM is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate MSSM's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by MSSM, EPA's review of records pertaining to MSSM, and the inspector's observations, EPA has determined that MSSM has unlawfully stored hazardous waste without a license or interim status as a result of MSSM's failure to comply with certain conditions for a license exemption Mich. Admin. Code. r. 299.9306(1)-(3) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the license exemption conditions with which MSSM was out of compliance at the time of the inspection in paragraphs 1, below.

Many of the conditions for a RCRA license exemption are also independent requirements that apply to licensed and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its license exemption due to a failure to comply with an exemption condition incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q), the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption condition identified in paragraph 1 is also an

independent TSD requirements incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q). Accordingly, each failure of MSSM to comply with this condition is also a violation of the corresponding requirement in Mich. Admin. Code. r. 299.9601(1) and (2) and 299.11003(1)(m) – (o).

## STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

The license exemption conditions identified below in paragraph 1 is also an independent TSD requirements violated by MSSM.

#### 1. Use and Management of Containers

Under Mich. Admin. Code. r. 299.9306(1)(a)(i), 40 CFR § 265.174 [40 C.F.R. §§ 262.34(a)(1)(i) and 265.174, at least weekly, a large quantity generator of hazardous waste must inspect areas where containers are stored. The owner or operator must look for leaking containers and for deterioration of containers caused by corrosion or other factors.

At the time of the inspection, MSSM provided records of the container storage area that documented less than weekly inspections from May 24, 2017, to June 1, 2017.

**Summary:** By failing to comply with the conditions for a license exemption, above, MSSM became an operator of a hazardous waste storage facility, and was required to obtain a Michigan hazardous waste storage license. MSSM failed to apply for such an operating license. MSSM's failure to apply for and obtain a hazardous waste storage license violated the requirements of Mich. Admin. Code. r. 299.9502(1), 299.9508 and 299.9510 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a license exemption condition incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q) is also an independent violation of the corresponding TSD requirement.

At this time, EPA is not requiring MSSM to apply for a Michigan hazardous waste storage license so long as it immediately establishes compliance with the conditions for a license exemption outlined in paragraph 1 above.

During the inspection, as observed by EPA, and after the inspection, as documented in an email to EPA, you established compliance with the weekly (i.e., every seven days minimum) above frequency of container area inspections condition. Based on the information received from MSSM on May 11, 2018, EPA is not planning additional enforcement actions based on this inspection at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA appreciates MSSM's cooperation.

If you have any questions regarding this letter, please contact Ms. Sue Rodenbeck Brauer, of my staff, at (312) 353-6134 or at Brauer.sue@epa.gov.

Sincerely,

Gary J. Victorine, Chief

RCRA Branch

#### Enclosure

cc: Jack Schinderle, MDEQ (SchinderleJ@michigan.gov)

Lonnie Lee, MDEQ (leel@michigan.gov)

Alexandra Clark, MDEQ (ClarkA37@michigan.gov)

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### U. S. Environmental Protection Agency Region 5, Land and Chemicals Division RCRA Branch 77 West Jackson Boulevard Chicago, Illinois 60604

### RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:

Michigan Spring & Stamping of Muskegon LLC

**EPA ID NUMBER:** 

MID006018485

ADDRESS:

2700 Wickham Drive

Muskegon, Michigan 49441

DATE OF INSPECTION:

August 8, 2017

**EPA INSPECTOR:** 

Sue Rodenbeck Brauer

Environmental Scientist/Enforcement Officer

PREPARED BY:

Sue Rodenbeck Brauer

Compliance Section 2

late

APPROVED BY:

Julie Morris, Chief

Compliance Section 2

Date

5/15/18

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#### **Purpose of Inspection**

This inspection was an evaluation of Michigan Spring & Stamping of Muskegon LLC's (MSSM's) compliance with hazardous waste, used oil, and universal waste regulations found at Michigan Administrative Code and the Code of Federal Regulations (CFR). I performed the inspection without the Michigan Department of Environmental Quality. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) core program compliance evaluation inspection (CEI). MSSM notified as large quantity generator. The NAICS are: 332612 SPRING (LIGHT GAUGE) MANUFACTURING and 332613 SPRING MANUFACTURING.

#### **Participants**

Sue Rodenbeck Brauer, Environmental Scientist/Enforcement Officer, EPA Kim Mayberry, Environmental Coordinator Paul Vander Laan, Vice President of Operations Tim Zwit, President

#### **Introduction**

On August 8, 2017, I arrived at the site before 9:00 a.m. I introduced myself, presented inspector credentials, and exchanged business cards with MSSM's representatives. Business cards are included in this report as Attachment A. I said that the CEI usually begins with a meeting followed by a site tour, records review, and ends with discussion. Ms. Mayberry provided a description of the site operations, led the tour, and provided the records I requested for review.

I provided a Small Business Resources information sheet and the Region 5 P2 program contacts to Ms. Mayberry. I asked her what personal protective equipment would be needed for the site tour. She identified safety glasses and stated that hearing protection is required in case of eighthour exposure. I informed Ms. Mayberry that MSSM could claim any information gathered during the inspection as Confidential Business information including: verbal information, documents and photographs. She stated that some machines may be confidential business information. Ms. Mayberry did not make a CBI claim on the information gathered during the inspection.

#### **Site Description**

The following information about MSSM is based on the personal observations of the EPA inspector, on the review of select EPA site records, and on representations made during the CEI by Ms. Mayberry or as otherwise specified.

Ms. Mayberry provided the following information about MSSM operations. MSSM has been located on Wickham Drive since the mid-1950s. MSSM employed about 130 or 140 employees, some temporary, in three shifts operating seven days a week. The business almost failed in 2008, leading to a merger with American Coil Spring (ACS). MSSM makes springs and stamps strips of metal. Eighty-five to 90 percent of their business is automotive. The building is 100,000 square feet, including the office and is all on one level.

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Some of the wastes generated are from ongoing production.

- Alkaline degreaser (D002, D007, D008) is used to remove oil from springs and stampings.
- Ignitable mineral spirits (D001) are used for lubricating raw material during forming.
- Wipes are used to clean up solvent used to clean the finishing department and paint guns (acetone and methyl ethyl ketone, F003, D035).
- The austemper heat treat salt quench generates spent oxidizing solids (sodium nitrate, potassium nitrite, D001).
- Steel springs and stampings are dipped, to prevent corrosion, in ignitable mineral spirits with corrosion inhibitors (D001, D008).

Other wastes are generated from periodic cleaning of process equipment and discarding old chemical products.

- Alkaline degreaser tank cleanout (D002, D008).
- Obsolete boiler additive (D002).
- Unused carpet cleaner (D002).
- Mercury electrical device spill residue (D009).

I copied the above wastestreams from MSSM's 2015 biennial report (RCRAInfo's Biennial Report Module).

#### Site Tour

I took photographs during the site tour. See Attachment B to this inspection report.

Ms. Mayberry provided a map of emergency equipment locations for use during the site tour. I marked the waste storage locations with triangles on the map during the tour. See Attachment C.

MSSM shapes metal into wire forms. Some stamping or shaping machines use hydraulics and generate used oil (photo DSCN 0989 in Attachment B).

MSSM does its own metal finishing (shot peening, chemical conversion coating) and heat treating. MSSM passivates metal with nitric acid. This creates a protective film on metal by immersion into an acid solution. The acid solution becomes spent as the metal concentration increases in the acid. The spent acid is treated and the wastewater is discharged to the municipal sewer. Alkaline rinses are treated and discharged. (See photo DSCN 0990 in Attachment B.) Ms. Mayberry commented that this process generates the most waste, 18 tons of non-hazardous sludge from wastewater treatment annually. MSSM also does zinc phosphating and has an air permit for emissions from this process. MSSM paints parts and uses Dykem on metal as a base for layout drawings. MSSM uses paint gun(s) and generates paint gun cleaning waste. (See paint waste-related photos DSCN 0991, 0993, 0994, and 0996 in Attachment B.)

The process of austempering involves heating metal parts under excess carbon (gaseous) followed by a molten salt quench to control the rate of cooling and metallurgical changes. The salts are strong oxidizers (potassium and sodium nitrate) and, when spent, are D001 waste.

In brief, MSSM accumulates hazardous waste, used oil, and universal wastes in containers. The containers were all labeled to identify the contents, closed, and not leaking.

#### Records Review

I completed a large quantity generator checklist, MDEQ Form EQP 5163, see Attachment D.

I reviewed waste determinations and waste analysis records for wastewater filter cake (non-hazardous), solids gravity settled from the oil water separator (non-hazardous), dry touch oil (D008), and oil oleum (D001, F003, F005).

I reviewed manifests, noting who signed for MSSM to check for RCRA training. I observed that MSSM ships small volumes of waste frequently. The shipments change hands several times before reaching the designated facility. Ms. Mayberry provided me with a copy of manifest 003486163 GBF upon request (Attachment E). The third transporter of this shipment, Maumee Express, signed for the shipment on July 13, 2017. The designated facility received the shipment on July 25, 2017.

I reviewed weekly container inspection logs and noted four occasions when more than a week (i.e., seven days) passed between inspections. The 2017 dates were January 17 to January 25; January 25 to February 2; May 11 to May 19; and May 24 to June 1. These 2017 periods are of eight days duration.

I reviewed training records and found no issues.

I reviewed the Integrated Plan for compliance with RCRA contingency plan requirements. The plan was last updated on April 28, 2017, due to a changed waste management company and its emergency number.

#### **Closing Conference**

I explained to Ms. Mayberry that the container inspections are supposed to be weekly (i.e., on or before the seventh day). While the transporter holding a shipment for more than ten days is an issue for the transporter rather than MSSM, I discussed whether MSSM could use larger containers or accumulate more on-site so that fewer transporters would handle MSSM's waste and the waste would reach the designated facility more quickly. Ms. Mayberry was satisfied with MSSM's current arrangement of relatively frequent small shipments. The inspection concluded before 1:00 p.m.

#### Attachments

- A. Business Cards
- B. Photo-Log and Photographs
- C. Emergency Equipment Location Map (with waste locations marked by inspector)
- D. Checklist EQP 5163
- E. Manifest 003486163 GBF

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# **ATTACHMENT A Business Cards**



Tim Zwit

President

2700 Wickham Dr. Muskegon, MI 49441 www.msands.com

(231) 755-1691 x251 Fax (231) 755-3449 Cell (231) 557-6271 tzwit@msands.com

ISO/TS 16949 Certilled / ISO 14001 Certilled



Paul Vander Laan Vice President of Operations

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2700 Wickham Dr.

Cell (616) 366-8046 Tel (231) 755-1691 x270 pvanderlaan@msands.com



Kim Mayberry

Environmental Coordinator

2700 Wickham Dr. Muskegon, MI 49441 www.msands.com

Tel (231) 765-1691 x254 Fax (231) 755-5140 kmaybeny@msands.com

ISOVES 16949 Contified / ISO 14001 Continue - Lunes princes



U.S. Environmental Protection Agency, Region 5

Sue Rodenbeck Brauer

Environmental Scientist Land and Chemicals Division

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Printed on 100% Post Consumer Paper

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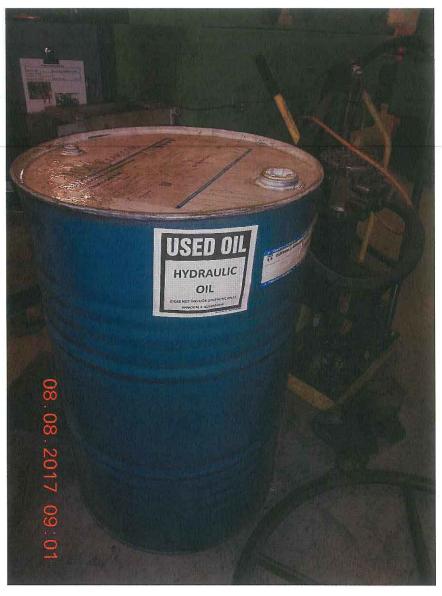
# **ATTACHMENT B Photo-Log and Photographs**

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RCRA Inspection Photo-Log Photographer: Sue Rodenbeck Brauer Location: Michigan Spring & Stamping of Muskegon LLC Date: August 8, 2017

Photo	Description	Time
DSCN0989	MSSM's used oil container is labeled, not leaking, and in good	9:01 a.m.
	condition. The hydraulic machine operator removed the used oil	
	from hydraulic machinery into the waste drum.	
DSCN0990	A wastewater pit is located out of sight in an adjacent room. The	9:05 a.m.
	oil-water separator (top blue box) never worked well, according	
	to Ms. Mayberry, but it does help remove solids from the sump	· · ·
	water. The sludge tested non-hazardous according to Ms.	
	Mayberry.	
DSCN0991	This satellite accumulation drum for absorbents is in the Paint	9:12 a.m.
	Room. The drum label states, "Hazardous Waste—Federal Law	
	Prohibits Improper Disposal. If found," The DOT description	
	identifies Acetone and MEK as well as the F003 Hazardous	
Dag Toogs	Waste code. The drum was not full and was not dated.	
DSCN0992	Absent	0.21
DSCN0993	This drum is also shown in DSCN 0994. It is in the Scrap Room.	9:31 a.m.
	The label identifies contents as ignitable (D001) waste paint-	
	related material. The drum is not full and does not have an accumulation start date.	
DSCN0994	The hazardous waste drum on the left is also shown in DSCN	9:32 a.m.
DSCN0994	0993. The large print label on top identifies its purpose as	9.32 a.III.
	"Defective Aerosol Can Disposal." The fiberboard drum on the	
	right is labeled, "Universal Waste Electronics."	
DSCN0995	The Universal Waste Electronics drum is also shown in DSCN	9:32 a.m.
DBCN0993	0995. To the right, Universal Waste Electric Lamps are stored in	7.52 a.m.
	closed, dated (all spring 2017), and labeled containers on wall	
	racks.	
DSCN0996	The drum contains hazardous waste identified as D001, D035,	9:40 a.m.
	F003, and F005. The DOT description includes Waste Paint	
	Related Materials and UN1263. The drum is not full and is not	
	dated.	
DSCN0997	View of MSSM from visitor parking space across Wickham	12:50 p.m.
	Drive, looking East. This photograph documents the end of the	*
	inspection.	

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<b>Photo Data Category</b>	Photo Data	Photo Description
Initials		MSSM's used oil container is labeled, not leaking
Photo	DSCN 0989	and in good condition. The hydraulic machine
Date	August 8, 2017	operator removed the used oil from hydraulic
Time	9:01 a.m.	machinery into the waste drum.
Photographer	Sue R. Brauer	
CBI (Y/N)	N	,

2700 Wickham Drive

Muskegon, Michigan 49441



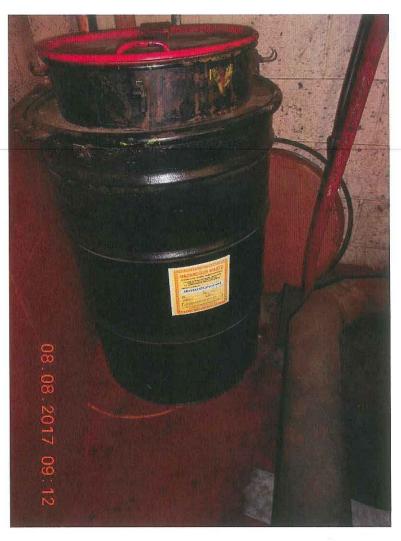


<b>Photo Data Category</b>	Photo Data	Photo Description
Initials		A wastewater pit is located out of sight in an
Photo	DSCN 0990	adjacent room. The oil-water separator (top blue
Date	August 8, 2017	box) never worked well, according to Ms. Mayberry,
Time	9:05 a.m.	but it does help remove solids from the sump water.
Photographer	Sue R. Brauer	The sludge tested non-hazardous according to Ms.
CBI (Y/N)	N	Mayberry.

2700 Wickham Drive

Muskegon, Michigan 49441

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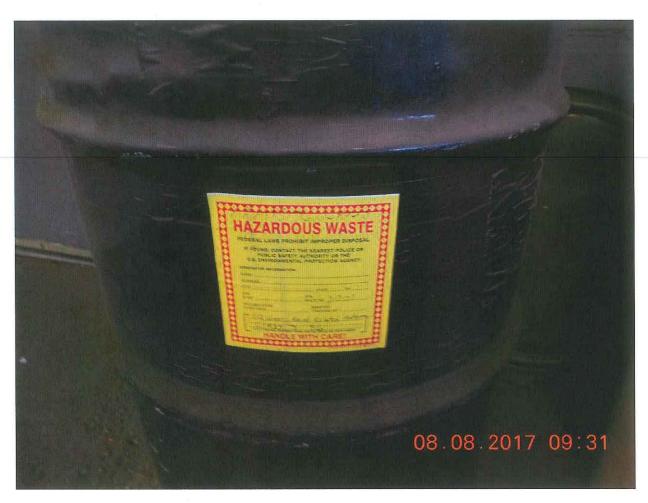


<b>Photo Data Category</b>	Photo Data	Photo Description
Initials		This satellite accumulation drum for absorbents is
Photo	DSCN 0991	located in the Paint Room. The drum label states,
Date	August 8, 2017	"Hazardsou Waste—Federal Law Prohibits Improper
Time	9:12 a.m.	Disposal. If found," The DOT description
Photographer	Sue R. Brauer	identifies Acetone and MEK as well as the F003
CBI (Y/N)	N	Hazardous Waste code. The drum was not full and was not dated.

2700 Wickham Drive

Muskegon, Michigan 49441

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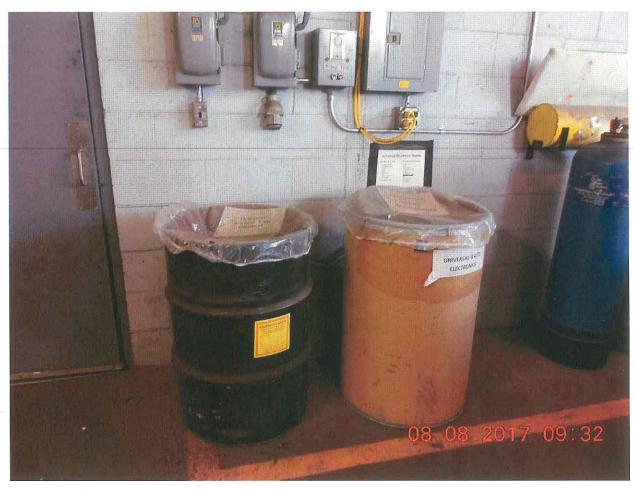


<b>Photo Data Category</b>	Photo Data	Photo Description
Initials		This drum is also shown in DSCN 0994. It is in the
Photo	DSCN 0993	Scrap Room. The label identifies contents as
Date	August 8, 2017	ignitable (D001) waste paint-related material. The
Time	9:31 a.m.	drum is not full and does not have an accumulation
Photographer	Sue R. Brauer	start date.
CBI (Y/N)	N	

2700 Wickham Drive

Muskegon, Michigan 49441

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<b>Photo Data Category</b>	Photo Data	Photo Description
Initials		The hazardous waste drum on the left is also shown
Photo	DSCN 0994	in DSCN 0993. The large print label on top identifies
Date	August 8, 2017	its purpose as "Defective Aerosol Can Disposal."
Time	9:32 a.m.	The fiberboard drum on the right is labeled,
Photographer	Sue R. Brauer	"Universal Waste Electronics."
CBI (Y/N)	N	
Michigan Spring & Stan	nping of Muskegon L	rc

2700 Wickham Drive

Muskegon, Michigan 49441

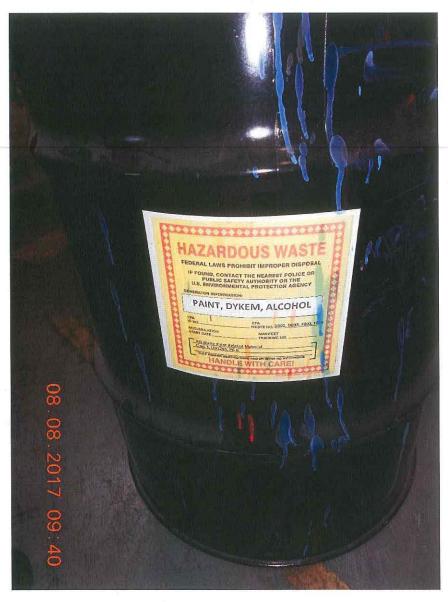
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<b>Photo Data Category</b>	Photo Data	Photo Description
Initials		The Universal Waste Electronics drum is also shown
Photo	DSCN 0995	in DSCN 0995. To the right, Universal Waste Electric
Date	August 8, 2017	Lamps are stored in closed, dated (all spring 2017),
Time	9:32 a.m.	and labeled containers on wall racks.
Photographer	Sue R. Brauer	7
CBI (Y/N)	N	

2700 Wickham Drive

Muskegon, Michigan 49441



<b>Photo Data Category</b>	Photo Data	Photo Description
Initials		The drum contains hazardous waste identified as
Photo	DSCN 0996	D001, D035, F003, and F005. The DOT description
Date	August 8, 2017	includes Waste Paint Related Materials and
Time	9:40 a.m.	UN1263. The drum is not full and is not dated.
Photographer	Sue R. Brauer	
CBI (Y/N)	N	

2700 Wickham Drive

Muskegon, Michigan 49441

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Photo Data Category	Photo Data	Photo Description
Initials		View of MSSM from visitor parking space across
Photo	DSCN 0997	Wickham Drive, looking East. This photograph
Date	August 8, 2017	documents the end of the inspection.
Time	12:50 p.m.	
Photographer	Sue R. Brauer	
CBI (Y/N)	N	
Michigan Spring & Stan	nping of Muskegon L	LC

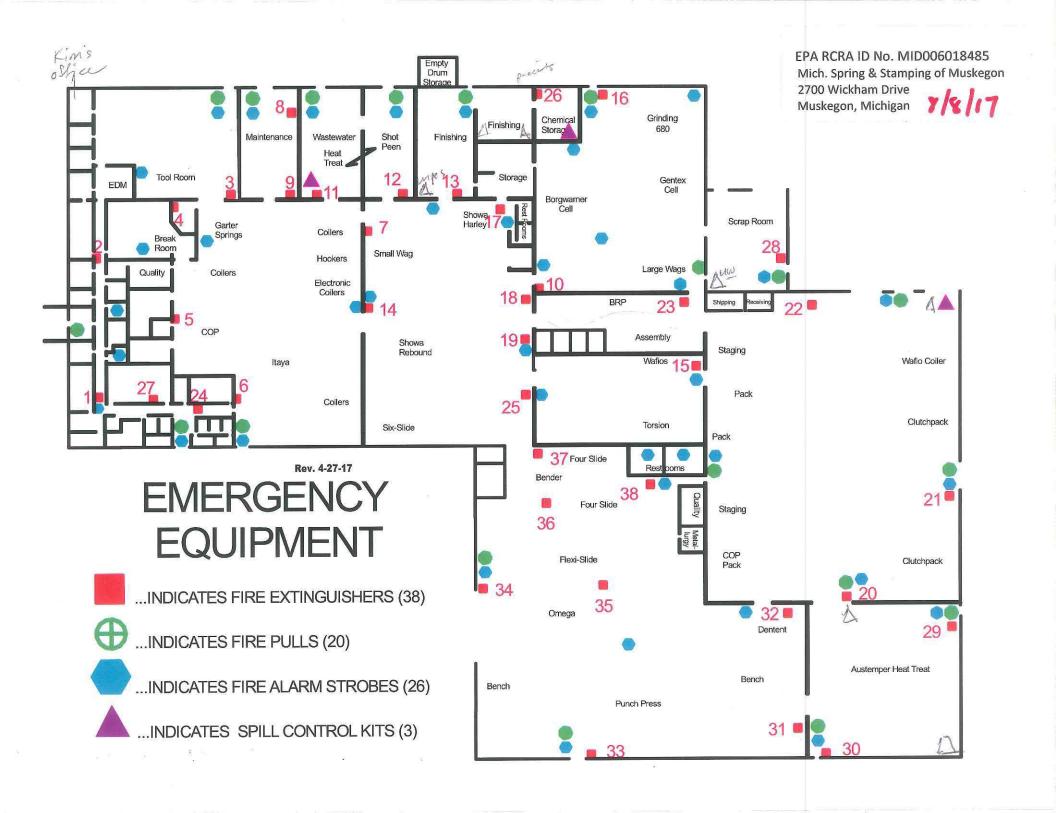
2700 Wickham Drive

Muskegon, Michigan 49441



# ATTACHMENT C Emergency Equipment Location Map (with waste locations marked by inspector)

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## ATTACHMENT D Checklist EQP 5163

#### Department of Environmental Quality FULLY REGULATED GENERATOR (FRG) INSPECTION FORM

Facility's Name			Part 3	Rules
DateID# _			1994 F	A 451
HAZARDOUS WASTE AND WASTE #	SOURCE	Н	OW MUCH	
See report,	1	V Politica		
E	PA RCRA ID No. MID006018485	A A		-100-10
	Nich. Spring & Stamping of Muskegon	amouse a con-		1)
	700 Wickham Drive			
Nugl Us	Auskegon, Michigan	IDe.	1011 11	2
abbreviated FACILIT	Y COMPLIANCE REQUIRED IN ALL AREAS			
	E DETERMINATION (Rule 302: 40 CFR 262.11		V=0 114	Щ
NI = Not inspected; N/A = Not applicable)  1. Determined if waste streams are hazardous waste	o2 /Pulo 302: 40 CEP 262 44\\	262A	YES NO	NI N/A
<ul> <li>a) copy of waste evaluation on-site 3 years? (Ru</li> </ul>		262D	1/1	NI N/
		262A	1/3	NI N/
b) re-evaluated waste when changes in material		262C	[]_	NI (NI
	treating wastes on-site? (Rule 306)(1)(d):40 CFR 268.7(a)(5)) FICATION NUMBER (Rule 303: 40 CFR 262.12)	2020		tai far
Has the generator obtained an identification number		262A	W1_	NI N/
MANIFES	T REQUIREMENTS (Rule 304: 40 CFR 262.20)	201		
Copies of the manifest readily available for review		FSS	IVI	NI N/
5. Manifests kept for the past 3 years? (Rule 307(3)		262D	[V]_	NI N/
	o instructions in appendix of Part 262 contain the following:		icani	A - (F-C)
a) manifest document number (Rule 304(1)(b): 4		262B	1/1_	NI N/
b) generator's name, address, phone & ID # (Ru	ıle 304(1)(b): 40 CFR 262.20(a)(i)),	262B	Wi_	NI N/
c) name & ID # of the transporter. (Rule 304(1)(	b): 40 CFR 262.20(a)(i)),	262B	W_	NI N/
d) name, address & ID # of TSDF. (Rule 304(1))	(b): 40 CFR 262.20(a)(i)),	262B	[./]	NI N/
e) DOT description of waste(s). (Rule 304(1)(b):	40 CFR 262.20(a)(i)),	262B	4	NI N/
f) quantity of waste, type & # of containers. (Rule	e 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[1],	NI N/
g) hazardous waste number of the wastes. (Rule	e 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[1/1/_	NI N/
h) generator signature, initial transporter & date	of acceptance. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	ĽV1	NI N/
7. NOT APPLICABLE				
<ol> <li>For out-of-state manifests, if not submitted by des requested by Director? (Rule 304(2)(c))</li> </ol>	signated facility, generator submitted copy of 3 <sup>rd</sup> signature manifest as	262B	ப_	NI N/
<ol><li>Is the transporter used properly registered &amp;/or p</li></ol>	ermitted under Act 138, Sec. 2 (3)? (Rule 304(1)(c)) office	262B	Ш	NI N/
NOTE: For shipments of hazardous waste solely by	water or rail shipments, within United States see Rule 304(4)(g or h).			
10. Using manifest that has expired? (Rule 304(1)(a	): 40 CFR 262.20)	262B		NI N
11. Reportable exceptions (Rule 308(3): 40 CFR 26	2.42)(a).	11 (1.8)	W. II.	
a) number of manifests generator HASN'T rece			9	0
b) number of manifests generator HASN'T sub-	mitted exception reports to RA & DEQ after 45 days:			
12. Facility has written program to reduce volume/tox	cicity/recycle wastes? (Rule 304(1)(b):40 CFR 262.27(a))	262B	<u>LJ</u>	_ NI N
	The state of the s			
13. Facility discusses program in place to reduce vo	lume/toxicity/recycle of waste (Rule 304(1)(b): 40 CFR 262.27(a))	262B	LJ	NI N/

#### LAND DISPOSAL RESTRICTION REQUIREMENTS

NOTE: If wasts has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient. If the treatment standards for the listed waste is sufficient. If the treatment standards for the listed waste in bedder waste for bedding the characteristic, oxcept for DO1 and D002. (40 CFR 288.9(b))  If restricted waste exceeds treatment standards or prohibitions did notice go w initial shipment?  (Rule 311(1):40 CFR 286.7(a)(3))  OR  If it restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1):40 CFR 286.7(a)(3))  OR  If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1):40 CFR 286.7(a)(4))  OR  If the standards in the standards of the pack that contains none of the waste, did a notice go with initial shipment? (Rule 311(1):40 CFR 286.7(a)(4))  OR  If the standards include it is supported to the pack that contains none of the waste in supportic in for a continuous go with initial shipment? (Rule 311(1):40 CFR 286.7(a)(1) or 286.7(a)(2) or 286.7(a)(3)  Did the notice include: (Rule 311(1):40 CFR 286.7(a)(1) or 286.7(a)(2) or 286.7(a)(3)  Did the notice include: (Rule 311(1):40 CFR 286.7(a)(1) or 286.7(a)(2) or 286.7(a)(3)  Did the notice include: (Rule 311(1):40 CFR 286.7(a)(1) or 286.7(a)(2) or 286.7(a)(3)  Did the notice include: (Rule 311(1):40 CFR 286.7(a)(a)  Did generator/realer claim they are going to monitor for rule regulated constituents in the waste in table in 286.4  Did generator/realer claim they	14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))			
NOTE: If waste has both isled & characteristic waste codes, the treatment standard for the isled waste is sufficient if the treatment standard for the isled waste in characteristic, except for DOD and DOD. (4 OF R. 286.9(b))  5. If restricted waste exceeds treatment standards or prohibitions did notice go wi initial shipment?  (Rule 311(1):40 CFR 286.7(a)(2))  OR  7. If waste has exception from prohibition on the type of land disposal method utilized for the waste in standard for the waste constituents in the waste in standard for the waste constituents in the waste in standard for t	a) all listed waste	268A	[1/	_ NI N/A
standards for the islated waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for DOD and DOD2, (40 CFR 268,7(a)(2))  5. If restricted waste exceeds treatment standards or prohibitions did notice go will initial shipment?  (Rule 311(1):40 CFR 268,7(a)(2))  OR  7. If wested has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1):40 CFR 268,7(a)(3))  OR  7. If wester has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1):40 CFR 268,7(a)(4))  OR  8. If fiscility chose a sitemative readment standard for let pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1):40 CFR 268,7(a)(2))  OR  9. Did the notice include: (Rule 311(1):40 CFR 268,7(a)(2))  OR  10. Did the notice include: (Rule 311(1):40 CFR 268,7(a)(2))  OR  10. Did the notice include: (Rule 311(1):40 CFR 268,7(a)(2))  OR  10. Did the notice include: (Rule 311(1):40 CFR 268,7(a)(2))  OR  10. Did the notice include: (Rule 311(1):40 CFR 268,7(a)(2))  OR  10. Did the notice include: (Rule 311(1):40 CFR 268,7(a)(2))  OR  10. Did the notice include: (Rule 311(1):40 CFR 268,7(a)(2))  OR  10. Did the notice include: (Rule 311(1):40 CFR 268,7(a)(2))  OR  10. Season and the s	b) all characteristic wastes?	268A	14/_	_ NI N/A
(Rule 311(1):40 CFR 288.7(a)(2))  8. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1):40 CFR 288.7(a)(3))  7. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1):40 CFR 288.7(a)(4))  8. If facility choose alternative treatment standard for lat place that contains none of the waste in appendix IV, did a notice of certification go with initial shipment? (Rule 311(1):40 CFR 288.7(a)(4))  9. Did the notice include: (Rule 311(1):40 CFR 288.7(a)(1) or 288.7(a)(2) or 288.7(a)(3)  3. EPA hazardous waste #7  288.A	standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteri			
6. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))  OR  7. If waste has examption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))  OR  8. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(3))  9. Dot the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3))  9. Dot the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3))  9. Dot the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3))  9. Unit wastewater or non-wastewater as defined in 268.2(dkf)?  9. Waste analysis data, where available?  9. Waste on stituents that the treater will monitor, if monitoring will not include all regulated constituents to 10 constituents that the treater will monitor, if monitoring will not include all regulated constituents to 10 constituents that the recase will monitor. If monitoring will not include all regulated constituents to 10 constituents that the recase will monitor. If monitoring will not include all regulated constituents to 10 constituents that the recase will monitor in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) a 268.9  9. did generator/freater claim they are going to monitor for runderlying hazardous waste onstituents  9. did generator/freater claim they are going to monitor for runderlying hazardous waste onstituents  10. Doter than notices for waste exceeding treatment standards, did on the vaste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.4(a)  10. Den		268A	V.	NI N/A
shipment? (Rule 311(1): (40 CFR 268.7(a)(3))  OR  7. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))  OR  8. If facility choose elternative treatment standard for late pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))  9. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(2) or 268.7(a)(3)  9. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(2) or 268.7(a)(3)  9. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(2) or 268.7(a)(3)  9. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(2) or 268.7(a)(3)  9. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(2) or 268.7(a)(3)  9. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(2) or 268.7(a)(3)  9. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(2) or 268.7(a)(3)  9. Waste constituents that the treater will monitor. If monitoring will not include all regulated constituents that the treater will monitor. If monitoring will not include all regulated constituents in the vaste code under regulated constituents waste constituents that the treater will monitor. If monitoring will not include all regulated constituents in the vaste code under regulated constituents waste constituents waste code under regulated constituents in the vaste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1)) & 268.9  9. Did generator/freater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(3)) & 268.9  10. Other than notices for waste exceeding treatment standards do CFR 268.7(a)(a) & 268.8  11. NINO  13. Did generator/freater claim they are going to monitor for ALL regulated constituents in the waste in the constituents (except vanadium and zinc), reasonably expected to be present at the generator poi		mitial	Γ	~
7. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))  8. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(2))  9. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)  3. EPA hazardous waste #?  268A			LJ_	NI(N/A)
initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))  OR  8. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(3))  9. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)  a) EPA hazardous waste fly  268A	<del> </del>			
8. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(3))  9. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)  a) EPA hazardous waste #7  268A		268A	LJ_	NI,N/A
did a nötice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))  9. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)  a) EPA hazardous waste #?  268A	OR	2000 2010 2010		
a) EPA hazardous waste #?  268A	<ol> <li>If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice &amp; certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))</li> </ol>	268A	<u>ا</u> ــا	_ NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?  c) subcategory of the waste (such as D003 reactive cyanide) if applicable?  268.8	19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)	2.6-830/00.00	-0000 >=9\\\	
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?  268A	a) EPA hazardous waste #?	268A	W_	_ NI N/A
d) manifest number associated with the shipment?  e) waste analysis data, where available?  f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001-F005, F039, D011, D002, D012-D043? (freatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)  g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)  g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)  g) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268.5 Subpart D & 268.41)  g) of the notice is for shipments that meet the standards does the notice include the certification?  g) if the notice is for shipments under prohibitions does the notice include as atatement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?  g) of the notice is for shipments under prohibitions does the notice include as atatement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?  g) of the notice is for shipments under prohibitions does the notice include as atatement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?  g) of the notice is for shipments under prohibitions does the notice include as atatement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?  g) of the notice is for shipments under prohibitions does the notice include as atatement that the waste isn't prohibited from land disposal & date the was	b) if wastewater or non-wastewater as defined in 268.2(d&f)?	268A	W_	NI N/A
e) waste analysis data, where available?  1) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D003? (treatment standards for hazardous waste in table in 28.4.0 for the waste code under regulated constituents)  1) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D0043? (treatment standards for hazardous waste in table in 28.4.0 for the waste code under regulated constituents)  1) waste constituents waste in the order of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)  2) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.A)  1) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), easonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.A	c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	268A	W	_ NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D0437 (treatment standards for hazardous waste in table in 268.4.0 for the waste code under regulated constituents)  UNLESS  g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)  h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generator point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48)  268A L.J. NI	d) manifest number associated with the shipment?	268A	W_	_ NI N/A
for F001- F005, F039, D001, D002, D012-D0437 (treatment standards for hazardous waste in table in 268.4 of for the waste code under regulated constituents)  UNLESS  g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9 (a) (b) & 268.9 (b) (c) & 268.9 (c) & 268.9 (c) (c) & 268.9 (c) & 268.9 (c) (c) & 268.9	e) waste analysis data, where available?	268A	ப_	NI N/A
g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9.)  All did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48)  O. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3)  a) if the notice is for shipments that meet the standards does the notice include the certification?  b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?  COTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)  COTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iiv) for the notice requirements which must be followed by the statement "This hazardous de is subject to alternative treatment standards of 40 CFR 268.45."  1. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6) 268A	for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	268A	<u>LJ_</u>	_ NI N/A
indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)  268A				
(except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48)  268A			<u>u</u> _	_ NI,N/A
a) if the notice is for shipments that meet the standards does the notice include the certification?  b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?  268A	(except vanadium and zinc), reasonably expected to be present at the generation point, above UTS	268A	<u></u>	_ NI N/A
b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?  (OTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44) (OTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous de is subject to alternative treatment standards of 40 CFR 268.45."  1. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6) 268A 1 NI NI. NI. NI. NI. NI. NI. NI. NI. NI.	20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3)			de C
prohibited from land disposal & date the waste is subject to prohibition?    Date	a) if the notice is for shipments that meet the standards does the notice include the certification?	268A	Ц.	NIN_
In the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one-time notice stating same in the facility file? (40 CFR268.7(a)(7))  3. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8) 268A 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		268A	டி	_ NIN/A
2. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))  3. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8))  268A		ment "Th	nis haza	rdous debri
one- time notice stating same in the facility file? (40 CFR268.7(a)(7))  3. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8)  268A	21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6)	268A	W _	NI N/A
3. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8) 268A NI N/N NI N/N NI N/N NI	22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	268A	L	_ NI (VA)
when the waste is excluded from the definition of hazardous waste or solid waste.  DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)  4. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))  TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)  5. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))  BIENNIAL REPORT (Rule 308: 40 CFR 262.41)  6. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)  NI N	23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8)	268A	W	NI N/A
TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)  5. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))  BIENNIAL REPORT (Rule 308: 40 CFR 262.41)  6. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)  DATE: A Company of the	when the waste is excluded from the definition of hazardous waste or solid waste.  DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 26	88.3)	V _ Jus	January A
5. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))  BIENNIAL REPORT (Rule 308: 40 CFR 262.41)  6. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41) pageed 3/1 (262D NI	14. Generator unitie nazardous waste or treatment residue of a nazardous waste to avoid profibilion? (40 GFR: 208.3(a))	200A	L	A NINA
BIENNIAL REPORT (Rule 308: 40 CFR 262.41)  6. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41) pagned 3/1 (262D 1/2 NI N		Maria de la compansión		
6. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41) pigned 3/1 (47 (262D 1) NIN	25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))	268A	Ц	NI WA
6. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41) pigned 3/1 (47 (262D 1) NIN	BIENNIAL REPORT (Rule 308: 40 CFR 262.41)		,	
7. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41) propried 3/1/2016	262D	1/1/	_ NI N/A
	27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	262D	L/I	NI N/A

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	PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)		YES N	0	
28.	Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a):40 CFR262.30)) WOT ready to Ships	262C	co.said_		N/A
29.	Are waste packages marked & labeled per DOT 49 CFR172 concerning hazardous materials (required before shipping waste off- site)?(Rule 305(1)(b)(c): 40 CFR 262.32(a))	262C	co.said_	obsrvd	
30.	On containers of 119 gallons or less, is there a warning, generator's name, address, site identification number, manifest tracking number & waste code per DOT 49 CFR172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	262C	co.said_		N/A
31.	If required (>1000 #'s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	<u></u>	NI	N/A
	ACCUMULATION TIME (Rule 306: 40 CFR 262.34)	A			
32.	If hazardous waste accumulated in containers: (If no, skip to #35)		-0-3 X PA	-	
	a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2)) none full	262C	T 1	NI	(N/A)
	b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	262C	M		N/A
	c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	262C	1/1	70 010	N/A
nement	d) has more than 90 days elapsed since date marked? (Rule 306(1)	262C	- Jo	(NI	(N/A)
			SR	98/1	7
	OR			( . ( .	1
	e) one of the following apply:	0000			Jun )
-	i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	Ц_	_ NI	NA
	<ul><li>ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7):40 CFR 262.34(g))</li></ul>	262C	ш_	_ N	N/A
	iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8):40 CFR 262.34(h)	262C	<u></u>	NI	N/A
	<ul> <li>iv) generator applied for &amp; received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(9-10):40 CFR 262.34(i))</li> </ul>	262C	Ц_	_ N	N/A
	The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 C	FR 262	34(a)(*	1).	
	f) are containers in good condition? (265.171)	262C			N/A
(6) - 5339	g) are containers compatible with waste in them (265.172)	262C		NI	N/A
ge uit je	h) are containers stored closed? (265.173(a))	262C	[V]	_ NI	N/A
	i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b)	262C	- N	1 NI	N/A
	j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code authority for less than 15 meter? (265.176)	262C	M	NI	N/A
	k) are containers inspected weekly for leaks and defects? (265.174)	262C	M_	NI	N/A
	I) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	262C	1	NI	N/A
	m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))	262C	W1_	_ NI	N/A
	n) are incompatible wastes stored in separate containers? (265.177(a))	262C	L/1_	NI	N/A
	o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C		/ NI	N/A
	p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	L/1_	NI	N/A
	Rule 306(2) & 40 CFR 262.34(c)(1) both refer to 40 CFR 265.171, 265.172 & 265.173	(a)			
33.	If hazardous waste is being accumulated at the point of generation:	aj.			
	a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))	262C	1/1	NI	N/A
	b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	1/1		N/A
	c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	1/1		N/A
	d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	1/1	11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	N/A
	e) are container(s) in good condition? (265.171)	262C	1/1		N/A
	f) are container(s) compatible with waste in them? (265.172)	262C			N/A
	g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C			N/A
34.	If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:	Continued to		- 17.55	100 C
	a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	262C	f 1	_ NI	NIA,
	b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))	262C	[ 1	Half Control	N/A
	Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.		1	<b>-</b> 1	
35.	If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area included the	de	,	-	
	a) impervious base free of cracks? (264.175(b)(1)):	262C	<u>L</u>	_ N	N/A

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262C N N/A EQP 5163 (Rev. 8-02-2013) Page 3

b) sloped or otherwise designed to elevate/protect	containers from contact with liquids? (264.175(b)(2))	262C	W_	NI	N/A
c) hold 10% of volume of containers or volume of the	ne largest container, whichever is greater? (264.175(b)(3))	262C	[1/1/	_ NI	N/A
d) run-on prevented unless sufficient capacity? (26	4.175(b)(4))	262C	<u> </u>	_ NI	N/A
e) accumulated liquids removed in a timely manner	to prevent overflow? (264.175(b)5))	262C	[ <u>L</u> ]_	_(NI	N/A
NOTE: Closure of Accumulation Area covered under # 5	3				
36. If accumulating solids, (other than F020,F021,F022,	F023, F026, F027), is haz waste accumulation area sloped or vise protected from contact with liquids? (264.175(c)(1 & 2))	262C	<u>u</u>	_ NI	N/A
37. Is hazardous waste accumulated in other than tanks not accumulated, i.e.: process tank?	or containers? Or, is hazardous waste generated but Explain any yes answer.		۵ا	/ NI	N/A
38. Waste area protected from weather, fire, physical da	mage & vandals? (Rule 306(1)(e))	262C	LVI_	_ NI	N/A
<ol> <li>Hazardous waste accumulated so no hazardous was into soil, directly or indirectly, into surface, ground-wado not violate Act 451, Part 55? (Rule 306(1)(f))</li> </ol>	ste or hazardous waste constituent can escape by gravity aters, drains or sewers, and such that fugitive emissions	262C	<u>√</u>	NI	N/A
40. Is hazardous waste accumulated in tanks?	If so, complete Tank System inspection form.			√NI	N/A
41. Is hazardous waste placed on drip pads?	If so, complete Wood Preserving inspection form			√ NI-	N/A
	1)(d) & 40 CFR 262.34(a)(4) refers to 265.16 PERSONNEL TRAINING (265.16)		,		
42. Did personnel receive training? (265.16)	TENCOMINE HOMAINO (200.10)	262C	Wi_	NI	N/A
43. Do personnel training records contain the following:			, ne		and the sale
a) job title? (265.16(d)(1))	st	262C	EVI_	[N]	N/A
b) job descriptions? (265.16(d)(2))	A STATE OF THE STA	262C		_ NI	Ň/A
c) name of employee filling each job? (265.16(d)(1)	)	262C	UVI_	_ NI	N/A
d) description of type & amount of both introductory	& continued training? 265.16(d)(3)) by Leray toner	262C	14/1_	_ NI	N/A
e) training designed so facility personnel can respon		262C	10/	_ NI	N/A
f) records of training? (265.16(d)(4))		262C	W1_	_ NI	N/A
g) do new personnel receive required training within	n 6 months? (265.16(b)	262C		NI	N/A
h) do training records show personnel have taken p	art in annual training? (265.16(c))	262C	Mi_	NI	N/A
i) training by person trained in hazardous waste ma	anagement procedures? (265.16(a))	262C	ſ✓i_	_ NI	N/A
	CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.  DNESS AND PREVENTION (265.30-265.37)	- XX.11			
	f fire, explosion, release of hazardous waste or hazardous waste	262C	co.said	_obsrvo	N/A
45. If required, does this facility have the following:					
a) internal communications or alarm systems? (265	.32(a))	262C	<u></u>	NI	N/A
b) telephone or 2-way radios at the scene of operat	ions? (265.32(b))	262C	W_	_ NI	N/A
c) portable fire extinguishers, fire control, spill control	ol equipment and decontamination equipment? (265.32(c))	262C	WJ_	_ NI	N/A
d) adequate volume of water and/or foam available	for fire control? (265.32(d))	262C	<u></u>	_ NI	N/A
46. Testing and Maintenance of Emergency Equipment		123.5 HHI - D- 1-		47	
a) owner/operator test & maintain emergency equip	ment to assure operation? (265.33)	262C	W1_	_ NI	N/A
b) has owner/operator provided immediate access t	o internal alarms? Access to alarm system is applicable only if rec	quired (	40 CFR	265. 3	32)
i) when hazardous waste is being poured, mixed	d, etc. (265.34(a))	262C		_ NI	N/A
ii) if only one employee on the premises while fa	cility is operating. (265.34(b))	262C	<u></u>	_ NI	NIA
c) aisle space for unobstructed movement of person	nnel/emergency equipment? (265.35)	262C	LV	_ NI	N/A
47. Has the facility made arrangements with local author	ities? (265.37(a)&(b)) fire dupt visits/inspects //yr.	262C	<u></u>	_ NI	N/A
five local box for 24/1 access Rule 306(1)(d) & 40 CONTINGENCY PLA	CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.  N AND EMERGENCY PROCEDURES (265.50-265.56)		*1 =		
	ould threaten human health or the environment? (265.51(b))	262C		_ NI	N/A
49. Does the contingency plan contain the following:					
	explosions/unplanned release of hazardous waste? (265.52(a & b))	262C	W1_	NI	N/A
	tals, contractors, state & local emergency responders for	262C	<u></u>	_ NI	N/A
		- 4	100		- 2

Integrated plan

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					100		7
	c)	name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	262C	Ly	<u> 1</u>	NI	N/A
	d)	list emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	262C	[v	<u> 1</u>	NI	N/A
	e)	evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	262C	L	1	NI	N/A
50.	Do	es the facility have an Emergency Coordinator? (265.55)	262C	L <sub>2</sub>	<u>1</u>	NI	N/A
	Em	ergency Coordinator and Emergency Procedures:			-cook	i usa	
	a)	emergency coordinator familiar with site operation & emergency procedures? (265.55)	262C	D	<u> </u>	NI	N/A
	b)	emergency coordinator has the authority to carry out the contingency plan? (265.55)	262C	L	4	NI	N/A
11 0	c)	if emergency occurred, did the emergency coordinator follow emergency procedures? (265.56)	262C	[_	1	NI	N/A
	d)	fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	nt 262C	L	1	NI	N/A
51.	Co	ntingency plan Amendments and Copies	2000000	n venn	e	**	
	a)	amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	262C	L		N	N/A
	b)	copies of plan on site and sent to local emergency organizations? (265.53)	262C	L	_1	N	N/A
		Rule 309 refers to 262, Subpart E except 262.54 & 262.55 INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)				1	
52.	Ha	s the facility imported or exported hazardous waste?	LOSE CONTRACTOR	-		N	N/A
	a)	exporting, has the generator:		-			5
		i) notified the Administrator in writing <12 months prior to shipment? (Rule 309(1): 40 CFR 262.53(a))	262E	L	1_	NI	N/A
***		ii) receiving country consented to accept waste. (Rule 309(1): 40 CFR 262.52(b))	262E	L	1	NI	NA
		iii) has copy of EPA Acknowledgment of Consent. (Rule 309(1): 40 CFR 262.52(c))	262E	L	1_	NI	N/A
	erens.	iv) complied with manifest requirements in Rule 309(2)(a-h).	262E	L	1_	NI	N/A
-		v) if required, was an exception report filled. (309(3)(a-c))	262E	L	<u></u>	NI	N/A
10 11	b)	importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	L	1_	NI	N/A
53.	The	Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114  ACCUMULATION AREA CLOSURE (265.111 & 265.114)  e accumulation area must be closed in a manner that:					
	a)	minimizes need for further maintenance (Rule 306(1)(g): 40 CFR 265.111(a))	262C	L		NI	MA
	b)	controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or hazardous waste constituents, leachate, run-off to ground/surface waters and air. (Rule 306(1)(g): 40 CFR 265.111(b))	262C	L		NI	N/A
	c)	all contaminated equipment, structures, and soil properly disposed of. (Rule 306(1)(g): 40 CFR 265.114)	262C	L	_1	NI	NIA
	کر	EPA RCRA ID No. MID006018485  Mich. Spring & Stamping of Muskegon 2700 Wickham Drive					

### ATTACHMENT E Manifest 003486163 GBF

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$\uparrow$	UNIFORM HAZARDOUS 1.6 WASTE MANIFEST			Page 1 of 3. Emer	gency Respons	e Phone	4. Manifest	Tracking Nu	mber 6163	G
	5 Generalors Name and Mailing Ad 2700 WIEKHAM C HURKESOW MI	idress Kossetambini Brive 1944		Generato	or's Site Addres	s (if different th	nan mailing addres			
	Generator's Phone; 6. Transporter 1 Company Name		(231) 755-1	<u> </u>			U.S. EPA ID N	lumber	<u> </u>	
	HERYTACE-CRYS	Fral Clean,	11.				1			
	7. Transporter 2 Company Name	$\leq \lambda$	1.80				U.S. EPAID N		18/193	79
	8. Designated Facility Name and Site	e Address	r regenera				U.S. EPA ID N	lumber	5 2 7,57	
	-755 INDUSTRIAL SUNTER, SC 291 Facility's Phone:	L ROPD		ž ting S	03)773	-1400	कर्षे के के - -	ا اللها الله	위 최 <i>()</i> 포	¥1. 42
	9a. 9b. U.S. DOT Description (in	ncluding Proper Shipping Name	e, Hazard Class, ID Number,		10. Conta	alners	11. Total	12. Unit	13. Waste	- Codes
	HM and Packing Group (if any))		eren karing belandig	CMT. 3	No.	Туре	Quantity	Wt./Vol.	7063 F6	
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	15. GENERATOR'S/OFFEROR'S marked and labeled/placarded Exporter, I certify that the contil certify that the waste minimiz	CERTIFICATION: I hereby do do and are in all respects in projects of this consignment conforcation statement identified in 40	io Hose Recently	consignment are fully a ding to applicable inte EPA Acknowledgmen quantity generator) or	and accurately cornational and not to Consent.	lescribed abov	re by the proper sh mental regulations	nipping name	e, and are classifie ipment and I am th	ne Primai
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FACILITY	15. GENERATOR'S/OFFEROR'S marked and labeled/placarded Exporter, I certify that the contil certify that the waste minimiz Generator's/Offeror's Printed/Typed  16. International Shipments Transporter signature (for exports of 17. Transporter Acknowledgment of Transporter 1 Printed/Typed Name  Transporter 2 Printed/Typed Name  18. Discrepancy  18a. Discrepancy Indication Space  18b. Alternate Facility (or Generator Facility's Phone:	CERTIFICATION: I hereby de d, and are in all respects in projected of this consignment conforcation statement identified in 40 I Name  Import to U.S. only):  Receipt of Materials  Quantity	eclare that the contents of this coper condition for transport according to the attached of CFR 262,87(a) (if I am a large	consignment are fully adding to applicable inte EPA Acknowledgmen quantity generator) or Signature  Export from U.S.  Signature	and accurately of emational and not of Consent.  (b) (If I am a sr  Port of Date lea	described above attornal government quantity go	re by the proper st mental regulations enerator) is true.	Dipping name	Month Month	Day Day Day
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EPA RCRA ID No. MID006018485
Mich. Spring & Stamping of Muskegon
2700 Wickham Drive
Muskegon, Michigan

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DESIGNATED FACILITY	36.	, Hazardous Waste Report Management Method	Codes (i.e., codes for l	hazardous waste treatm ţ	ent, disposal, and	recycling systems)			ı		•	
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Mich. Spring & Stamping of Muskegon
2700 Wickham Drive
Muskegon, Michigan